

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

VANDROTH BACKUS, WILLIE )  
HARRISON BROWN, CHARLESANN )  
BUTTONE, BOOKER MANIGAULT, )  
EDWARD MCKNIGHT, MOSES MIMS, JR, )  
ROOSEVELT WALLACE, and WILLIAM )  
G. WILDER, on behalf of themselves and all )  
other similarly situated persons, )  
Plaintiffs, ) Civil Action No.  
v. ) 3:11-cv-03120-PMD-HFF-MBS  
THE STATE OF SOUTH CAROLINA, )  
NIKKI R. HALEY, in her capacity as )  
Governor, KEN ARD, in his capacity as )  
Lieutenant Governor, GLENN F. )  
MCCONNELL, in his capacity as President )  
Pro Tempore of the Senate and Chairman of )  
the Senate Judiciary Committee, ROBERT W. )  
HARRELL, Jr., in his capacity as Speaker of )  
the House of Representatives, JAMES H. )  
HARRISON, in his capacity as Chairman of )  
the House of Representatives' Judiciary )  
Committee, ALAN D. CLEMMONS, in his )  
capacity as Chairman of the House of )  
Representatives' Elections Law )  
Subcommittee, MARCI ANDINO, in her )  
capacity as Executive Director of the Election )  
Commission, JOHN H. HUDGENS, III, )  
Chairman, CYNTHIA M. BEN SCH, )  
MARILYN BOWERS, PAMELLA B. )  
PINSON, and THOMAS WARING, in their )  
capacity as Commissioners of the Elections )  
Commission, )  
Defendants. )

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**DEFENDANT GLENN F. MCCONNELL'S  
IDENTIFICATION OF EXPERT WITNESS**

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Pursuant to the Court's scheduling order of January 5, 2012, the Defendant Glenn F. McConnell hereby identifies the expert that he intends to call as an expert at trial of this case:

Richard L. Engstrom, Ph.D.  
Center for the Study of Race, Ethnicity  
And Gender in the Social Sciences  
Social Science Research Institute  
Duke Box 90420  
Duke University  
Erwin Mill  
Durham, NC 27705  
Telephone: 504-756-1478

Defendant reserves the right to supplement this notice if Plaintiffs' expert report, which is to be filed today, provides any guidance on Plaintiffs' theory of the case—which Plaintiffs have yet to disclose.

*Signature Page Follows.*

Respectfully submitted,

s/ William W. Wilkins

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*Attorneys for Defendant Glenn F. McConnell*

January 11, 2012  
Greenville, South Carolina